

1 Mitchell D. Gliner, Esq.
2 Nevada Bar #003419
3 3017 West Charleston Blvd., #95
4 Las Vegas, NV 89102
5 (702) 870-8700
6 (702) 870-0034 Fax
7 mgliner@glinerlaw.com

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ADRIENNE JONES,)

11 Plaintiff,)

12 vs.)

13 OCWEN LOAN SERVICING, LLC,)

14 Defendant.)

No. 2:15-cv-00272-JAD-CWH

15 STIPULATION TO EXTEND THE DISCOVERY
16 DEADLINE BY 90 DAYS
17 [FIRST REQUEST]

18 This stipulation is filed pursuant to local rule 6-1. It *has not* been filed pursuant to local
19 rule 26-4. Local rule 26-4 requires any request to extend a discovery or case management
20 deadline be received no later than twenty-one (21) days prior to the expiration of the subject
21 deadline¹. On April 9, 2015 this Honorable Court adopted the parties' initial Stipulated
22 Discovery Plan and Scheduling Order which provided for a discovery deadline of September 28,
23 2015 [#9].

24 Description of remaining discovery to be completed: The parties have responded to one
25 another's initial written discovery. Each side will take the deposition(s) of the other. Plaintiff

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28 ¹ This Stipulation has been filed twenty (20) days prior to the expiration of the discovery deadline. Counsel for both Plaintiff and Defendant indeed apologize to this Honorable Court and the Honorable Magistrate for this indiscretion. The parties indeed intended to file this Stipulation last Friday, prior to the extended Holiday weekend, but failed to mutually approve the document that day.

1 may be required to take the depositions of the 30(b)(6) designees of the respective national credit
2 reporting entities.

3 The parties are genuinely discussing settlement and may be able to avoid conducting time
4 consuming, expensive depositions.

5 Accordingly, the parties request adoption of the following deadlines:

- 6 1. Last date to complete discovery: December 28, 2015
7 2. Last date to file dispositive Motions: January 28, 2016
8 3. Last date to file Joint Pretrial Order: February 29, 2016 or thirty (30) days after
9 decision deciding dispositive motion.

10 DATED: September 8, 2015

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12 MITCHELL D. GLINER, ESQ.

WRIGHT, FINLAY & ZAK, LLP

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14 
MITCHELL D. GLINER, ESQ.

/s/ Inku Nam

EDGAR C. SMITH, ESQ.

15 Nevada Bar No. 3419

Nevada Bar No. 5506

16 3017 W. Charleston Blvd. # 95

INKU NAM, ESQ.

17 Las Vegas, Nevada 89102

Nevada Bar No. 12050

Attorney for Plaintiff

7785 W. Sahara Avenue, #200

Las Vegas, Nevada 89117

Attorneys for Defendant

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20 IT IS SO ORDERED:

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23 UNITED STATES MAGISTRATE JUDGE
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25 DATED: September 9, 2015
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